

#### NH Department of Transportation

Division of Operations Environmental Implementation Procedure Date: 2/10/11

Bureau: Highway Maintenance

Procedure EIP-16 Revision: 3.1
Management Review Page 1 of 3

#### **PURPOSE:**

The purpose of this Environmental Implementation Procedure (EIP) is to establish a procedure for Bureau and NHDOT management to annually evaluate performance of the EMS and provide direction and input for the EMS and overall environmental improvement.

The Management Review completes one EMS cycle and begins another cycle. The review is intended to empower the EMS Team and Bureau employees to act and move forward in the continual environmental improvement process.

#### RESPONSIBILITY:

Office of Stewardship and Compliance (OSC):

- Provide oversight and assist Bureaus in preparing, conducting, and following up on Management Reviews.
- Participate in annual Bureau and NHDOT Management Review meetings.
- Summarize Bureau-level management reviews, conduct NHDOT upper-level Management Reviews, and follow up on NHDOT management input.
- Coordinate with Bureau EMS Teams and provide input to NHDOT management about identified needs for EMS and environmental performance improvements.

#### Director/Bureau Administrator:

- Select key Bureau managers to participate in annual Management Review meetings.
- Provide leadership, direction, and recommendations to the Bureau EMS Team.
- Advocate that adequate resources are available to implement recommendations.

#### Bureau EMS Coordinator:

- Coordinate with OSC, Bureau management, and the EMS Team to conduct annual Management Reviews.
- Lead Bureau efforts to summarize and present EMS information and data including progress toward achieving objectives and targets, results of internal and external EMS evaluations and compliance audits, and corrective and preventative actions taken during the year.
- Along with the EMS Team, provide input to Bureau management concerning identified EMS and environmental performance improvements needed including new or proposed legal and regulatory requirements, changes in significant environmental aspects and impacts, and changes in Bureau operations that could affect the EMS and environmental performance.



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Page 2 of 3

#### Bureau Employees:

• As applicable, participate in annual Management Review meetings.

 Report any identified needs for EMS and environmental improvements to Bureau management and the EMS Team.

#### **DOCUMENTS AND RECORDS:**

- Management Review Meeting Agenda
- Management Review Meeting Summary/Minutes

#### PROCEDURE:

- 1. At least annually, The Director, Bureau Administrator, OSC, and the Bureau EMS Team review the EMS to:
  - Evaluate the suitability and effectiveness of the EMS for the organization's operations.
  - · Reassess the EMS policy and each EMS element.
  - · Direct or redirect resources, as required.
  - Provide input on new or revised objectives and targets.
- 2. The Bureau EMS Coordinator documents the Management Review, prepares a meeting agenda, records meeting minutes. Distribute the meeting minutes within the organization as appropriate.
- 3. The management review meeting should include a review of:
  - Progress on meeting objectives and targets.
  - Monitoring results and corrective action reports.
  - Findings from EMS Audits and Compliance Evaluations.
  - Communications and interactions with interested parties including the public, regulatory agencies, and other stakeholders.
  - Environmental and regulatory incident reports.
  - Any changes in Bureau operations and services, legislation, regulation, other internal and external requirements and commitments, and stakeholder considerations.
  - Recommendations for improvement in the EMS and the Bureau's environmental performance.



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Division of Operations Environmental Implementation Procedure	Date: 2/10/11
Bureau: Highway Maintenance	
Procedure EIP-16	Revision: 3.1
Management Review	Page 3 of 3

4. The Bureau EMS Coordinator maintains all documentation and key records generated as part of this EIP in accordance with EIP-9: Documentation, Document Control, and Records Management.

Approved://	Revision #: 3.1
Nama	Revision Date: 2/10/11
Stak Mant Engine	Supersedes Revision #:3.0
Title	Revision #: 3.0
Date 2 15 11	8

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New Hampshire Department of Transportation

**Bureau of Highway Maintenance** 

**Annual EMS Management Review** 

November 5, 2010



See handouts as we proceed

#### Bureau of Highway Maintenance Annual Management Review Agenda

- BHM EMS Team
- Environmental Policy
- Environmental Aspects and Impacts
- Objectives and Targets
- Environmental Action Plans
- Environmental Implementation Procedures



# Bureau Of Highway Maintenance

## **EMS Team Members**

District 1 – Dan Fogg

District 2 - Jon Johnson, Alan Hanscom

District 3 - Lane Evans, Dave Rodrigue

District 4 - Ryan Lavoie, Doug Graham

District 5 - Bob Richards, Richard Radwanski

District 6 - Doug Almon, Steven Ireland

Bureau 58 - Mark Kirouac



## EMS - Fenceline

Limited to Facility Property

Does not include roads and highways



## **EMS** - Framework

Manual

Environmental Implementation Procedures

Aspects

**Action Plans** 



Note manual revised but not distributed

# **Information Management**

G:drive

Bureau Intranet



# **Environmental Policy**

Awareness Training

Posted at all Bureau Facilities



See handout

## **Environmental Aspects and Impacts**

Facility Operations - 9

Vehicles And Equipment - 8

Facility Management and Support - 14

Grounds - 5

Administration - 4

Fuel Storage, Handling, and Dispensing - 4



See handout 1 page

## **Environmental Aspects and Impacts**

#### Ranking Criteria

- A. Degree of Impact on health, environment, and natural resources
- B. Degree of Concern by regulators, employees or public
- C. Frequency of Likelihood of occurrence
- D. Degree of Control
- Total Score = (A + B + C) \* D
- Significance



See handouts, 1- criteria, 2- legal requirements 6 pages,

## **EMS Objectives and Targets**

- 1. Improve Wastewater Handling and Disposal
- 2. Develop Work Instructions for Salt Handling
- 3. Improve Chemical Handling and Disposal
- 4. Improve Compliance of Hazardous and Special Waste
- 5. Improve Compliance of Equipment Painting Operations
- 6. Improve Compliance of UST and AST Programs



See handouts, 1 – BHM high significance, 2- combined objectives/targets general BHM, Traffic, Bridge Maintenance, 3- BHM objectives/targets specific

### Improve Wastewater Handling and Disposal

Floor Drains and Blind Sumps

Inventory of Disposal

Installation of oil/water separator and storage tanks – District 3 \$70,000



See handouts, 1 – summary table, 2 – work instruction

## **Develop BMPs for Salt Handling**

Work Instruction drafted



See handout – work instruction

Improve Chemical Handling and Disposal

**Inventory of Chemical** 

Chemical Handling Work Instruction

Chemical Disposal Work Instruction



See handouts 1 – work instruction handling, 2 – work instruction disposal

Improve Compliance of Hazardous and Special Waste

Development of Environmental Practice Guide - Maine Green Book



See handout - current draft, effort in progress

# Improve Compliance of Equipment Painting Operations

Paint Waste Study

**Equipment Maintenance List** 

Administrative Controls

Bulk Paint and Coated

Equipment Specification

Hired Equipment, Bridge

steel



See handout, 1 - draft work instruction, final paint waste report submitted to NHDES on 10/6/10, discuss equipment list, paint specification revision, equipment requisitions

# Improve Compliance of UST and AST Programs

**UST Training 2008** 

Operator A, B, and C Training completed prior to 8/2012 implementation deadline

**IMP Notifications** 



See handout, plots of past due notifications 2009 and 2010, 12.6% reduction

## **Environmental Implementation Procedures**

Team Review of "Toolkit" Version

Draft Bureau EIP 1 - 12

Team Review EIP 13 -16



See handout, plots of past due notifications 2009 and 2010, 12.6% reduction

#### **EMS Future**

- Complete 2009 Objectives and Targets
- EIPs
- Identify New Objectives and Targets
- Consultant Audit
- · Resources staff



EIPs contain much work to be completed and procedures to be implemented